

JOINT REPORTS, TESTIMONY, AND BOOKS cont.:

"A Note on Computational Simplifications and Extensions of the Conditional Probit Model," EPRI report on choice models, September 1977.

"Labor Supply Response of Males to a Negative Income Tax," Testimony for U.S. Senate Finance Subcommittee on Public Assistance, November 22, 1978.

"Appliance Choice with Time of Day Pricing," Energy Laboratory Report, January 1980.

"Discrete Choice Models with Uncertain Attributes," Oak Ridge National Laboratories Report, January 1980.

"Individual Savings Behavior," with P. Diamond, Report to the National Commission on Social Security, May 1980.

"Wealth Accumulation and Retirement," with P. Diamond, Report to the Department of Labor, May 1982.
"A Review of IFFS," Report to the Energy Information Agency, February 1982.

"A Model of Heating System and Appliance Choice," with J. Berkovec and J. Rust, December 1983.

"Labor Force Behavior of Older Men After Involuntary Job Loss," with L. Paquette, Report to Department of Health and Human Services, December 1985.

"Pollution and Work Days Lost," with D. Wise and B. Ostrow, NBER Working Paper, January 1984; Revised 1985.

"Demand for Interstate Long Distance Telephone Service," with A. Jafee and T. Tardiff, November 1985.

"Competition in the Information Market 1990", August 1990.

The Choice and Utilization of Energy Using Durables, ed. J. Hausman, Palo Alto: EPRI, 1981.

Social Experimentation, ed. J. Hausman and D. Wise, Chicago: 1985.

Future Competition in Telecommunications, ed. S. Bradley and J. Hausman, Harvard: 1989.

Contingent Valuation: A Critical Appraisal, ed. J. Hausman, North Holland, 1993.

Globalization, Technology and Competition, ed. S. Bradley, J. Hausman, R. Nolan, Harvard 1993.

"The Welfare Cost to the US Economy of Regulatory Restriction in Telecommunications," January 1995.

Economic Impact of Deregulating U.S. Communications Industries, The WEFA Group, Burlington, MA, February 1995.

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TIMOTHY J. TARDIFF

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Dr. Tardiff received a B.S. with honors in Mathematics from the California Institute of Technology in Pasadena and a Ph.D. degree in Social Science from the University of California, Irvine, under a National Science Foundation Pre-doctoral Fellowship and an NSF Grant for Improving Dissertation Research in the Social Sciences.

Dr. Tardiff joined the faculties of the Department of Civil Engineering and the Division of Environmental Studies at the University of California, Davis. He taught undergraduate and graduate level courses in transportation and environmental policy analysis. His research included applications of econometric models of consumer choice to transportation planning problems. Dr. Tardiff's research was funded by the National Science Foundation, the Institute of Transportation Studies and the California Department of Transportation.

Prior to joining NERA, Dr. Tardiff's work included transportation, energy, public utility and telephone industry projects for the U.S. Departments of Transportation and Energy, the California Energy Commission, and several telephone and electric utilities.

Since joining NERA, he has evaluated pricing policies for increasingly competitive telecommunications markets, including appropriate mechanisms for pricing access services to competitors; studied actual and potential competition for services provided by telephone operating companies; analyzed the demand and revenue impacts of new telephone rate structures; developed and evaluated damage studies used in major telecommunications antitrust actions; analyzed the market potential for cellular radio; evaluated the investment and marketing programs of telephone companies; and developed a demand model for analyzing the market potential for alternative employee health care plans, including health maintenance organizations.

Dr. Tardiff has published extensively in the transportation literature. He has presented and published papers on the telecommunications industry. These papers address the issues of pricing and costing policies for emerging competition in telecommunications markets; evaluating and forecasting the impacts of telephone rate plans such as local measured service; analyzing the markets for new telecommunications products and services; and local competition and the bypass issue.

EDUCATION

UNIVERSITY OF CALIFORNIA, IRVINE
Ph.D., Social Sciences, 1974

CALIFORNIA INSTITUTE OF TECHNOLOGY
B.S., Mathematics, 1971

EMPLOYMENT

NATIONAL ECONOMIC RESEARCH ASSOCIATES, INC.

1992 Vice President. Works on cases, mainly legal and regulatory, on issues of pricing policy, assessing demand for new and existing products and services, and economic damages. This work involves studies, often involving econometric demand analysis methods, for telecommunications, utilities and other clients. Specific areas have included: assessment of competition in the telecommunications industry; analysis of alternative approaches for regulating telephone utilities; evaluation of the benefits from telecommunication products and services; analyzing the demand for local services, toll, and carrier access; evaluation of the prudence of telephone company investments; damage studies for telecommunications antitrust cases; evaluation of methods for environmental damage assessment; and analysis of energy conservation /programs.

1984-1992 Senior Consultant

CHARLES RIVER ASSOCIATES, INC.--Boston, Massachusetts

1979-1984 Director of Marketing Research. Managed program to apply econometric customer demand models to marketing research problems in telecommunications, electric utilities, transportation and other industries.

Senior Research Associate. Performed studies on urban transportation, freight transportation, energy and telecommunications issues.

UNIVERSITY OF CALIFORNIA, DAVIS--Davis, California

1974-1979 Assistant Professor, Department of Civil Engineering and Division of Environmental Studies. Taught undergraduate and graduate course in transportation and environmental policy and quantitative research methods; conducted research on passenger transportation demand, (including econometric issues).

FELLOWSHIPS, GRANTS, AWARDS

First Place, Dissertation Contest of the Transportation Science
Section of the Operations Research Society of America.

NSF Research Initiation Grant (Engineering Division), 1976-1978.

NSF Grant for Improving Doctoral Dissertation Research in the Social Sciences,
1973-1974.

NSF Predoctoral Fellowship, 1972-1974.

Public Health Service Traineeship, 1971-1972.

AFFILIATIONS

American Economic Association
International Telecommunications Society

TESTIMONY

California Public Utilities Commission, on behalf of Pacific Bell, "Evaluation of MCI's Universal Service Funding Proposal," March 10, 1995.

California's Public Utilities Commission, on behalf of Pacific Bell, "Franchise Services and Universal Service," March 10, 1995 (with Richard D. Emmerson) .

Illinois Commerce Commission on behalf of GTE North: surrebuttal testimony on the benefits of intraMSA presubscription, September 30, 1994.

Illinois Commerce Commission on behalf of GTE North: rebuttal testimony on the benefits of intraMSA presubscription, September 16, 1994.

"Economic Evaluation of OIR/OII on Open Access and Network Architecture Development: Reply Comments," prepared for filing with the California Public Utilities Commission on behalf of Pacific Bell, March 31, 1994 (with Richard D. Emmerson).

"Declaration of Timothy J. Tardiff on Pacific Bell's Productivity Under Price Caps," prepared for filing with the Federal Communications Commission, on behalf of Pacific Bell, February 28, 1994.

"Regulation of Mobile and Wireless Telecommunications: Economic Issues," prepared for filing with the California Public Utilities Commission on behalf of Pacific Bell, February 25, 1994

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"Access to Intelligent Networks: Economic Issues," prepared for filing with the Federal Communications Commission, on behalf of Pacific Bell, December 1, 1993.

"The Effect of SFAS 106 on Economy-Wide Wage Rates," prepared for filing with the California Public Utilities Commission on behalf of Pacific Bell, October 1, 1993

"Economic Evaluation of the NRF Review: Reply Comments," prepared for filing with the California Public Utility Commission on behalf of Pacific Bell, May 7, 1993. William E. Taylor and Timothy J. Tardiff, Study Directors.

"Performance Under Alternative Forms of Regulation in the U.S. Telecommunications Industry," prepared for filing with the Canadian Radio-television and Telecommunications Commission on behalf of AGT Limited, April 13, 1993. Timothy J. Tardiff and William E. Taylor, Study Directors.

"Pacific Bell's Performance Under the New Regulatory Framework: An Economic Evaluation of the First Three Years," prepared for filing with the California Public Utility Commission on behalf of Pacific Bell, April 8, 1993. William E. Taylor and Timothy J. Tardiff, Study Directors.

"Pricing Interconnection and the Local Exchange Carrier's Competitive Interstate Services," prepared for filing with the Federal Communications Commission, on behalf of Pacific Bell, February 19, 1993.

"The Treatment of FAS 106 Accounting Changes Under Price Cap Regulation: Reply Comments," prepared for filing with the Federal Communications Commission on behalf of Pacific Bell, July 1992. William E. Taylor and Timothy J. Tardiff, Study Directors.

"Costs and Benefits of IntraLATA Presubscription," prepared for filing with the State of New York Public Service Commission on behalf of New York Telephone, May 1, 1992. Timothy J. Tardiff and William E. Taylor, Study Directors.

"The New Regulatory Framework 1990-1992: An Economic Review," prepared for filing with the California Public Utility Commission on behalf of Pacific Bell, May 1, 1992. William E. Taylor and Timothy J. Tardiff, Study Directors.

"The Treatment of FAS 106 Accounting Changes Under Price Cap Regulation," prepared for filing with the Federal Communications Commission on behalf of Pacific Bell, April 15, 1992. William E. Taylor and Timothy J. Tardiff, Study Directors.

"The Treatment of FAS 106 Accounting Changes Under Pacific Bell's Price Regulation Plan," prepared for filing with the California Public Utilities Commission on behalf of Pacific Bell, November 15, 1991. William E. Taylor and Timothy J. Tardiff, Study Directors.

"The Treatment of FAS 106 Accounting Changes Under Pacific Bell's Price Regulation Plan: Economic Analysis of the DRA Supplemental Testimony," prepared for filing with the California Public Utilities Commission on behalf of Pacific Bell, January 21, 1992. William E. Taylor and Timothy J. Tardiff, Study Directors.

California Public Utilities Commission on behalf of Pacific Bell: economic principles for pricing flexibility for Centrex service, Filed November 1990.

Expert Witness on State Transportation Energy Forecasting, California Energy Commission, Sacramento, September 1980.

SELECTED CLIENT REPORTS

Quantifying the Handicaps of Unequal Access, (Confidential) Prepared for Japan Telecom, January 1994.

Overcoming Unequal Access: The International Experience, with S. Krom, (Confidential) Prepared for Japan Telecom, January 1994.

Market Potential For Cellular Radio And Other Personal Communications Products, (Confidential) Prepared for Pac Tel Corporation, July 1990.

Customer Demand for Local Telephone Services: Models and Applications, Prepared for South Central Bell Telephone Company, August 1987.

Evaluation Plans for Conservation and Load Management Programs, Prepared for New England Electric System, July 1987.

Telecommunications Competition for Large Business Customers in New York (Confidential). Prepared for NYNEX Corporation, June 1987.

"Estimation of Residential Conservation Service Program Electricity Savings," Prepared for Southern California Edison Company, July 1984.

The Demand for Local Telephone Service Upon the Introduction of Optional Local Measured Service, In part. Final report, prepared for Southern New England Telephone, July 1982.

Transit Strategies to Improve Air Quality in the Philadelphia Region, In part. Final report prepared for the Delaware Valley Regional Planning Commission, April 1982.

Estimation of Energy Impacts of State Transportation Improvement Program Projects, In part. Final report prepared for the California Energy Commission, January 1982.

Consumer Representation for Transportation Energy Conservation, In part. Final report prepared for the U.S. Department of Energy, July 1981.

Indicators of Supply and Demand for Transportation Fuels, In part. Prepared for the California Energy Commission, December 1980.

State of the Art in Research on Consumer Impacts of Fuel Economy Policies: Recent Findings and Recommendations for Further Research, In part. Prepared for the National Highway Traffic Safety Administration, January 1980.

SELECTED PUBLICATIONS AND PRESENTATIONS

Tardiff, T.J., W.E. Taylor, and C.J. Zarkadas, "Periodic Review of Price Cap Plans: Economic Issues," presented at the Telecommunications Policy Research Conference, Solomons, Maryland, October 2, 1994.

Participant in AGT International Symposium on Local Interconnection Policy, Emerald Lake, British Columbia, Canada, May 27-28, 1994.

Tardiff, T.J., "Effects of Presubscription and Other Attributes on Long-Distance Carrier Choice," Presented at the 1994 National Telecommunications Forecasting Conference, Boston, Massachusetts, May 24, 1994.

Tardiff, T.J., "Access Charges and Toll Prices in the United States: An Economic Evaluation," Presented to representatives of Japanese Long-Distance Companies, New York, New York, May 16, 1994.

Tardiff, T.J. and W.E. Taylor, "Telephone Company Performance Under Alternative Forms of Regulation in the U.S.," presented at the Telecommunications Policy Research Conference, Solomons, Maryland, October 4, 1993.

Tardiff, T.J., "Interconnection and LEC Competitive Services: Pricing and Economic Efficiency," presented at the Telestrategies Conference: The Access Charge Revolution, Washington, D.C. May 18, 1993.

Hausman, J., T. Tardiff, and A. Belinfante, "The Effects of the Breakup of AT&T on Telephone Penetration in the United States," The American Economic Review, Vol. 83, May 1993, pp. 178-184.

Tardiff, T.J., "Assessing the Demand for New Products and Services: Theory and Practice," presented at the NRRI Conference on Telecommunications Demand for New and Existing Services, Denver, Colorado, August 6, 1992.

Tardiff, T.J., "Price and Cost Standards for Increasingly Competitive Telecommunications Services," presented at the Ninth International Conference of the International Telecommunications Society, Sophia Antipolis, France, June 17, 1992.

Tardiff, T.J. "Modeling The Demand For New Products and Services," presented at the NTDS Forum, Santa Fe, New Mexico, September 27, 1991.

Tardiff, T.J. and C. Zarkadas, "Forecasting Tutorial," presented at the National Telecommunications Forecasting Conference, May 29, 1991.

Tardiff, T.J. and W.E. Taylor, "Pricing the Competitive Services of Regulated Utilities," National Economic Research Associates, Working Paper No. 7, May 1991.

Hausman, J.A. and T.J. Tardiff, "Growth in New Product Demand Taking into Account The Effects of Price and Competing Products: Mobile Telecommunications," Presented at the Massachusetts Institute of Technology Telecommunications Business and Economics Program Second Annual Symposium, Cambridge, Massachusetts, November 1990.

Tardiff, T.J., "Structuring Telecommunications in Other Countries: View from the UK, Europe and Canada," Presented at the United State Telephone Association Affiliated Interest Issues Committee 1990 Fall Conference, Traverse City, Michigan, September 1990.

Tardiff, T.J. and M.O. Bidwell, Jr., "Evaluating a Public Utility's Investments: Cash Flow vs. Revenue Requirement," Public Utilities Fortnightly, May 10, 1990.

Tardiff, T.J. and C.J. Zarkadas, "Forecasting Demand for New Services: Who, What, and When," Presented at the Bellcore/Bell Canada Demand Analysis Forum, Hilton Head South Carolina, April 1990.

Tardiff, T.J., "Consumer Welfare with Discrete Choice Models: Implications for Flat versus Measured Local Telephone Service," Presented at the Bellcore/Bell Canada Demand Analysis Forum, Hilton Head South Carolina, April 1990.

Tardiff, T.J., "Telephone Regulation in California: Towards Incentive Regulation and Competition," Presented to the Bell Canada Economic Council, Hull, Quebec, Canada, February 1990.

Tardiff, T.J., "Measuring Competitiveness in Telecommunications Markets," in National Economic Research Associates, Telecommunications in a Competitive Environment. Proceeding of the Third Biennial Telecommunications Conference, Scottsdale, Arizona, April 1989, pp. 21-34.

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Perl, L.J. and T.J. Tardiff, "Effects of Local Service Price Structures on Residential Access Demand," Presented at the International Telecommunications Society North American Regional Meeting, Ottawa, Ontario, Canada, June 1989.

Tardiff, T.J. and W.E. Taylor, "Costing Principles for Competitive Assessment," in Telecommunications Costing in a Dynamic Environment, Proceedings of the Bellcore-Bell Canada Conference on Telecommunications Costing, 1989, pp. 497-518.

Tardiff, T.J., "Forecasting the Impact of Competition for Local Telephone Services." Presented at the Bellcore National Forecasting Conference, New Orleans, April 1987.

Tardiff, T.J., "Is Bypass Still a Threat," in National Economic Research Associates, Telecommunications in a Competitive Environment, Proceedings of Conference held in Scottsdale, Arizona, March 1987, pp. 27-41.

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Tardiff, T.J., "The Economics of Bypass," Presented at the Bellcore Competitive Analysis and Bypass Tracking Conference. Denver, March 1985.

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Tardiff, T.J., "Pricing and Marketing in the Competitive Local Access Market." In Present and Future Pricing Issues in Electric, Gas, and Telecommunications Industry. Proceeding of the Ninth Annual Rate Symposium on Problems of Regulated Industries. Columbia: University of Missouri, 1983.

Tardiff, T.J., J. Hausman and A. Baughcum, "The Demand for Optional Local Measured Service." In Adjusting to Regulatory, Pricing and Marketing Realities. Proceedings of the Fourteenth Annual Conference of the Institute of Public Utilities. East Lansing: Michigan State University, 1983.

Tardiff, T.J., W.B. Tye, L. Sherman, M. Kinnucan, and D. Nelson, Application of Disaggregate Travel Demand Models. National Cooperative Highway Research Program Report 253, 1982.

Tardiff, T.J., D. Wyckoff, and B. Johnson, "Shippers' Preferences for Trucking Services: An Application of the Ordered Logit Model." Proceedings of the Transportation Research Forum, Vol. 23, 1982.

Tardiff, T.J., P. M. Allaman, and F. C. Dunbar, New Approaches to Understanding Travel Behavior. National Cooperative Highway Research Program Report 250, 1982.

Tardiff, T.J., E. Ziering, J. Benham and D. Brand, "Energy Impacts of Transportation System Improvements." Transportation Research Record 870: 10-15, 1982.

Tardiff, T.J. and O.S. Scheffler, "Destination Choice Models for Shopping Trips in Small Urban Areas." Proceedings of the Transportation Research Forum, Vol. 22, 1982.

Tardiff, T.J., J.L. Benham and S. Greene, Methods for Analyzing Fuel Supply Limitations on Passenger Travel. National Cooperative Highway Research Program Report 229, 1980.

Tardiff, T.J., "Vehicle Choice Models: Review of Previous Studies and Directions for Further Research." Transportation Research 14A: 327-336, 1980.

Tardiff, T.J., "Specification Analysis for Quantal Choice Models." Transportation Science 13: 179-190.

Tardiff, T.J., "Attitudinal Market Segmentation for Transit Design, Marketing and Policy Analysis." Transportation Research Record 735: 1-7, 1979.

Tardiff, T.J., "Definition of Alternatives and Representation of Dynamic Behavior in Spatial Choice Models." Transportation Research Record 723: 25-30, 1979.

Tardiff, T.J., "Use of Alternative Specific Constants in Choice Modeling." Institute of Transportation Studies, University of California, Berkeley and Irvine, Report No. UCI-ITS-SP-78-6, December 1978.

Tardiff, T.J. and G.J. Fielding, "Relationship Between Social-Psychological Variables and Individual Travel Behavior." Proceedings of the Transportation Research Forum, Vol. 19, 1978.

Tardiff, T.J., T.N. Lam, and B.F. Odell, "Effects of Employment and Residential Location Choices on Urban Structure: A Dynamic Stochastic Simulation." Transportation Research Record 673: 86-93, 1978.

Tardiff, T.J., "Casual Inferences Involving Transportation Attitudes and Behavior." Transportation Research 11: 397-404, 1977.

Tardiff, T.J., "A Note on Goodness of Fit Statistics for Probit and Logit Models." Transportation 5: 377-388, 1976.

Tardiff, T.J., "The Effects of Socioeconomic Status on Transportation Attitudes and Behavior." Ph.D. Dissertation, School of Social Science, University of California, Irvine, 1974.

April 1995

ATTACHMENT B

DECLARATION OF ROBERT N. GARNER

I, Robert N. Garner, hereby declare as follows:

1. I am employed by Bell Atlantic Network Services, Inc. as Manager, Information Services. I am currently responsible for managing residential voice messaging services, including Bell Atlantic's Answer Call service. I have been involved in managing voice messaging services for Bell Atlantic for the past five years.

2. All seven Bell Atlantic telephone companies currently offer Answer Call telephone answering service to residential and business customers. Answer Call, when used with the Call Forwarding Busy/Don't Answer (also called Fixed Call Forwarding) complementary network services, automatically answers the customer's telephone line when the line is off-hook or is not answered after a number of rings specified in advance by the customer. The line is answered with a greeting that the customer has previously recorded, and the caller is invited to leave a recorded message. Answer Call subscribers may retrieve recorded messages from a touch-tone telephone located anywhere in the world by dialing a telephone number and entering an identification number.

3. Bell Atlantic first introduced residential Answer Call service in late 1989. Within a year, there were nearly 120,000 subscribers. That number has grown substantially each year. By the end of 1994, Bell Atlantic had over 1,050,000 residential subscribers to this service, and, assuming the maintenance of current regulatory requirements, subscribership is expected to continue to grow at double-digit rates through the remainder of the decade.

4. A principal reason for this growth in subscribership is the ability of customers to obtain Answer Call through Bell Atlantic's Residential Sales and Service Centers (business offices). Customers view Answer Call in the same way as any other optional feature of their local telephone service and expect to obtain it in the same manner as other services. Without the right to use the business office sales channels, Bell Atlantic would have been unable to market Answer Call effectively to the mass residential market. For this reason, Bell Atlantic would have been unlikely to offer Answer Call at all if a separate subsidiary was required. This is also the reason why no other company has offered a similar service to residential customers, either before or after Bell Atlantic's entry. As a result, Bell Atlantic's principal competition for Answer Call is telephone answering machines, which are mass-merchandised through such widely-available outlets as retail stores and mail order catalogues.

5. If the Federal Communications Commission were to reimpose structural separation for enhanced services, it is my belief that the future growth of Answer Call would be substantially reduced. Even if it were feasible for Bell Atlantic to replicate the business office staff, which it is not, and even with substantially increased advertising, it is my opinion that the inability of customers to obtain "one-stop shopping" of Answer Call along with their other telephone services would still reduce the demand almost as much. As a result, by the year 2000, based upon Bell Atlantic's market analysis, there will be more than one million fewer residential subscribers to Answer Call than would be the case under the present rules. The ability of customers to obtain Answer Call through the existing sales channels is, therefore, critical to the continued success of the service.

6. Bell Atlantic would also need to incur a significant cost in relocating processors and all basic communications services to newly-obtained space should the Commission reimpose structural separation. In order to minimize the disruption to existing customers, Bell Atlantic would move the equipment gradually, over a one-year period. We would need to transfer customer mailboxes from each processor to be moved initially to other processors, then relocate, install, and test one processor in each geographical area. We would then transfer as many mailboxes as possible to the equipment that has been moved, and repeat this process with each succeeding processor. Even with this gradual move, each customer would lose service for at least one day, and

possibly longer. As the new network is established, additional disruptions are bound to occur. Without counting any refunds required as a result of any protracted service outages, the cost of the move is likely to be at least \$15 million. If the Commission required a shorter transition period, the cost of the move would increase sharply, and customers would suffer considerably longer service disruptions.

7. A return to structural separation would also increase the on-going costs to Bell Atlantic to provide the service. These cost increases include duplicate installation and maintenance personnel, duplicate office and processor space, establishment of a new sales channel, and increased advertising. As a result of these cost increases, Bell Atlantic would need to raise the price of Answer Call service by about 25%.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 6, 1995



Robert N. Garner

ATTACHMENT C

COPY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
US WEST Communications, Inc.) CC Docket No. 90-623
Petition for Computer III Waiver)

COMMENTS OF BELL ATLANTIC¹

I. Introduction.

The Commission should promptly grant US WEST's requested Computer III waiver to offer a reverse-search capability in conjunction with its Electronic White Pages ("EWP") service² and extend that waiver to similar services offered by other local exchange carriers that are subject to Computer III.³ Such a waiver should be granted without determining that the proposed service is enhanced because, as shown below, it fits the Commission's previously-stated standard as an adjunct to basic service. Litigating the basic/enhanced definition in advance, however, could delay introduction of the service, which would not be in the public interest. Subsequent to granting the waiver,

¹ The Bell Atlantic Telephone Companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

² Petition for Waiver (filed April 4, 1994) ("Petition").

³ A "reverse-search" service enables the user to obtain the telephone subscriber's name and/or address by entering the telephone number.

the Commission should find that it was unnecessary, because the service is basic.

II. The Commission Should Grant A Waiver To US WEST And To Other Companies Proposing Similar Services.

US WEST shows that a reverse-search capability is viable in the marketplace only if it is combined with a basic EWP service⁴ and that it would be uneconomic to provide the proposed EWP reverse-search feature through a separate stand-alone database.⁵ US WEST has met its burden to support a waiver, and the Commission should grant its request.

Bell Atlantic is planning to offer a very similar service in certain jurisdictions later this year.⁶ It will be integrated into Bell Atlantic's existing forward search electronic directory service, Electronic ReQuest, so that a customer may obtain forward and reverse searches interchangeably. Bell Atlantic expects to use the same directory database for all directory searches. The system will detect whether a customer is seeking a forward or a reverse search and will direct the request to the proper software interface with the database. Bell Atlantic's Electronic ReQuest uses the same manufacturer's

⁴ Petition at 6-8.

⁵ *Id.* at 8-11.

⁶ Until US WEST filed the Petition, Bell Atlantic had not intended to seek a Computer III waiver, because it was apparent that the service met the Commission's adjunct to basic service standard.

equipment as does US WEST's EWP, and both services are configured using a similar architecture.⁷

US WEST describes in its Petition two service alternatives to an integrated service⁸ and concludes that neither would be economically viable.⁹ Bell Atlantic has also examined the alternatives to providing forward and reverse-search services on an interchangeable, integrated basis and comes to the same conclusion as US WEST. Maintaining a separate, stand-alone reverse-search service would cost a minimum of \$2.3 million. More significantly, it would eliminate the flexibility that enables customers to select both forward or reverse searches. A significant selling point is the convenience of obtaining both forms of directory search as part of the same integrated service, and customer demand will be sharply curtailed if artificial regulatory distinctions eliminate that convenience.

US WEST's other option, reconfiguring the system to create an interface between the forward-search database and reverse-search providers, would not only increase the cost to all customers, but it would require customers to go through more steps for reverse searches than for forward searches.¹⁰ This

⁷ Bell Atlantic is currently upgrading the equipment being used to provide its service and understands that US WEST plans a similar upgrade shortly.

⁸ Petition at 4-8.

⁹ *Id.* at 8-11.

¹⁰ Bell Atlantic tentatively estimates the cost of the interface to be around \$200,000.

inability to obtain both types of searches in the same convenient manner will curtail the demand and could make the service uneconomic to offer.

Bell Atlantic has shown that its proposal meets the standard for a Computer III waiver. The Commission should, therefore, grant Bell Atlantic a similar waiver to that which US WEST has requested.

III. The Commission Should Find That Reverse-Search Services Are Adjuncts To Basic Service.

Following grant of the waivers, the Commission should determine that reverse-search EWP services are adjuncts to basic service, not enhanced. In the NATA Centrex Order the Commission ruled that services that use the processing and storage capabilities of the telephone network to facilitate use of traditional telephone services are adjuncts to basic service and not enhanced under the Computer Rules.¹¹ It cited electronic directory assistance as an example of such a service.¹²

Five years later, the Commission reiterated that a forward-search electronic directory assistance service is an

¹¹ 47 C.F.R. § 64.702(a). See *North American Telecommunications Association, Petition for Declaratory Ruling Under Section 64.702 of the Commission's Rules Regarding the Integration of Centrex, Enhanced Services, and Customer Premises Equipment*, 101 F.C.C.2d 349 at ¶¶ 23-28 (1985) ("NATA Centrex Order").

¹² *Id.* at ¶ 26.

adjunct to basic service.¹³ The Commission in that order expressed no opinion on the status of reverse-search services, despite Bell Atlantic's urging that it do so.¹⁴ However, its justification for finding a forward-search service an adjunct to basic -- that it "facilitate[s] the placement of telephone calls,"¹⁵ applies to reverse-search services as well.

The ability to obtain the listed name of the subscriber will enable the user to determine if the telephone number is, in fact, associated with the party that the user intends to call. If it is not the intended party, then the reverse-search service avoids extraneous calls, the annoyance of wrong numbers, and unnecessary use of the network. Use of the capability, therefore, facilitates placement of telephone calls to the intended party.

The service will also allow the caller to determine the location of the destination telephone. This allows the user to know how to dial (i.e., whether an area code or 1+ dialing pattern is needed) and whether or not toll or message units will apply. This latter knowledge can assist the user in determining whether or not to place the call. In each case, the service facilitates call completion. As a result, it meets the Commission's standards for an adjunct to basic service.

¹³ *Southwestern Bell Telephone Company, Petition for Waiver of Section 69.4(b) of the Commission's Rules*, 5 FCC Rcd 3792 at ¶ 13 (1990).

¹⁴ *Id.* at n.9.

¹⁵ *Id.* at ¶ 13.

IV. Conclusion.

Accordingly, the Commission should grant the requested waiver to US WEST and to other companies offering similar services, such as Bell Atlantic for Electronic ReQuest service. It should follow that grant with a ruling that reverse-search electronic directory services are adjuncts to basic service.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

By Their Attorney

A handwritten signature in black ink, appearing to read "Lawrence W. Katz", is written over a horizontal line.

Lawrence W. Katz

Edward D. Young, III
Of Counsel

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May 9, 1994